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May 14, 2004

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**RE: Standardized and Enhanced Disclosure Requirements for Television
Broadcast License Public Interest Obligations, MM Docket No. 00-168;
Second Periodic Review of the Commission's Rules and Policies
Affecting the Conversion To Digital Television, MB Docket No. 03-15.**

Dear Ms. Dortch:

Pursuant to section 1.1206 (b)(2) of the Commission's rules, we hereby submit this notice regarding an *ex parte* meeting in the above-referenced proceedings.

On Wednesday, May 13, 2004, representatives of the Public Interest, Public Airwaves Coalition met with staff members of the FCC's Media Bureau. Attending the meeting were Rick C. Chessen, Mary Beth Murphy, Kim Matthews, and Roger Holberg of the Media Bureau; Gloria Tristani, Managing Director of the Office of Communication of the United Church of Christ, Inc.; Jeff Chester, Executive Director of Center for Digital Democracy; Meredith McGehee, Executive Director of the Alliance for Better Campaigns; and Angela Campbell, director, and James A. Bachtell, staff attorney, of the Institute for Public Representation at Georgetown University Law Center.

The group presented and discussed the attached proposed public interest television disclosure form with the Media Bureau. Members of Public Interest, Public Airwaves Coalition noted that the current issues/programs lists do not provide an effective means for the public to assess licensees' performance. Because the requirement of listing programs "that have provided the station's most significant treatment of community issues" is so vague, these lists lack uniformity and consistency and make it difficult to discern the amount and type of public interest programming a broadcaster carries. They are also inaccessible, available for inspection only at the main studio of the station during normal business hours.

The group noted that its disclosure form proposal, based on comments filed by UCC, *et al.* in 2000, is standardized and gathers information the public needs to meaningfully evaluate whether licensees are serving their public interest obligations. The form also helps the public determine how broadcasters are using their new digital spectrum. It also accommodates the group's public interest guidelines proposal, gathering the necessary information and placing the certification questions at the end of the form, so they can be incorporated if adopted by the FCC. Members also noted that filing the form with the Commission and placing it on the stations' web sites will give the public greater access to the information.

Members of the Public Interest, Public Airwaves Coalition also presented the proposed disclosure form to Commissioner Michael J. Copps' senior legal advisor Jordon Goldstein, Commissioner Kathleen Q. Abernathy's legal advisor Stacy Robinson Fuller, and distributed copies to the offices of Chairman Michael K. Powell, Commissioner Jonathon Adelstein, and Commissioner Kevin J. Martin.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced dockets. If you have any questions regarding this filing, please do not hesitate to contact me at (202) 662-9543.

Respectfully Submitted,

/s/

James A. Bachtell

Attachment